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**REMARKS**

Claims 1-45 are pending in the Application. New claims 46-48 are added by the present amendment. Claims 1-36 stand rejected by the present Office Action. Claims 37-45 have been withdrawn from consideration.

**I. THE CLAIMS ARE NOT INDEFINITE****A. Paragraph 3 Rejection of Claim 2**

In paragraph 2 of the Office Action, claim was rejected under 35 U.S.C. 112, second paragraph as assertedly indefinite. More specifically, claim 2 was rejected for insufficient antecedent basis for "said authenticating means."

Claim 1 has been amended to add the word "authenticating" to describe the means for revealing. Claims 10, 19 and 28 have been similarly amended. Dependent claims 7, 16, 25 and 34 were amended to correspond to independent claims 1, 10, 19 and 28.

The Applicants respectfully submit that the amendment of claim 1 provides the required antecedent basis for "authenticating means" in claim 2. The Applicants therefore respectfully request that the rejection of claim 2 under 35 U.S.C. 112, second paragraph be withdrawn.

**B. Rejection of Claims 7, 16 and 34**

Claims 7, 16, and 34 were rejected in Office Action paragraphs 4, 5 and 6, respectively under 35 U.S.C. 112, second paragraph as assertedly indefinite. In all three cases, it was indicated that the phrase "wherein said hidden indicia are associated with said plastic paper substitute" was not understood.

Claims 7, 16, and 34 have been amended to recite that encoded, hidden indicia "are printed on" rather than "associated with" the plastic paper substitute. The Applicants

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respectfully submit that claims 7, 16 and 34 as amended are not indefinite or unclear and that the rejection of these claims under 35 U.S.C. 112, second paragraph should be withdrawn.

## **II. THE CLAIMS ARE PATENTABLE OVER THE PRIOR ART**

### **A. Paragraph 7 Rejection of Claims 1-7, 9-16, 18-25, 27-34 and 36**

In paragraph 7 of the Office Action, claims 1-7, 9-16, 18-25, 27-34 and 36 were rejected under 35 U.S.C. 102(e) as anticipated by WO 98/15418 to Taylor et al ("Taylor Application").

The Applicants respectfully traverse this rejection.

#### **1. Claim 1**

As amended, claim 1 recites a self authenticating article comprising a plastic paper substitute adapted to retain various forms of indicia and authenticating means for revealing encoded, hidden indicia printed on a surface of said plastic paper substitute. The authenticating means defines an authenticating area which forms a unitary and integral structure in combination with the plastic paper substitute. The authenticating area is positionable in juxtaposed relation to the encoded, hidden indicia to provide for instant verification of the authenticity of the article.

#### **2. The Taylor Application**

The Taylor Application is directed to self-verifying documents that include a window that may be used for verifying, enhancing or optically varying a security device elsewhere on the document. Taylor Application, page 2, lines 19-21. The Taylor Application discloses a number of embodiments in which a self-verifying document may comprise a flexible sheet having a first portion including the window and a second portion including the security device, the sheet being foldable to bring the window into registry with the security device. Taylor Application, page 2, lines 22-29. Placing the window and security device in registry allows the security device to be viewed through or in conjunction with the window.

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The Taylor Application discloses a variety of ways in which the window and security device may be configured to authenticate a document. In one embodiment, the security device includes indicia microprinted on a flexible plastic sheet and the window includes a transparent magnifying lens. Taylor Application, page 8, line 10 to page 10, line 12. In a second embodiment, the security device includes indicia printed in metameretic inks and the window is tinted so that the indicia are altered when viewed through the window. Taylor Application, page 10, line 13 to page 11, line 17. A third embodiment involves the use of two transparent windows that provide a polarizing effect. Taylor Application, page 11, line 28 to page 13, line 9. In a fourth embodiment, the security device and the window are configured to produce one or more Moiré patterns when the security device is viewed through the window. Taylor Application, page 13, line 10 to page 14, line 24. In a fifth embodiment, the security device carries a first image portion and the window carries a second image portion. When the security device is viewed through the window, the complete image may be viewed. Taylor Application, page 15, lines 7-19.

### 3. The Taylor Application Does Not Disclose the Features of Claim 1

The Applicant respectfully submits that the Taylor Application does not disclose the features of claim 1 of the present Application. In particular, the Taylor Application does not disclose a self authenticating article comprising authenticating means for revealing encoded, hidden indicia printed on a surface of said plastic paper substitute. As described throughout the specification of the present application, the hidden indicia of the invention may be printed in an encoded form so that the indicia may only be viewed through the use of a corresponding decoder. See, e.g., Application, page, 10, lines 14-22; page 33, lines 15-19.

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One exemplary method of providing an encoded image is discussed in detail on pages 21-27 of the Application. In this method, the indicia are rasterized according to a set of predetermined parameters including line frequency. The indicia may then be "hidden" by incorporating the encoded image into a source image. Application, page 11, lines 3-23. The encoded image may be decoded using a lens with a corresponding frequency. Such a decoding lens could be used as the authenticating means of a self-authenticating document according to claim 1.

The Taylor Application does not disclose a document having encoded, hidden indicia or a means for revealing such encoded, hidden indicia. The nearest embodiment disclosed in the Taylor Application is the embodiment using metameric inks in the security device. In this embodiment, certain portions of an image might be revealed only upon viewing through the specially tinted window. There is no disclosure or suggestion, however, that the image be scrambled or encoded so that the optical characteristics of the window serve to reassemble (i.e., decode) the image.

Because the Taylor Application does not disclose the features of claim 1, the Applicants respectfully submit that the rejection of claim 1 under 35 U.S.C. 102(e) should be withdrawn.

#### 4. Dependent Claims 2-7 and 9

Claims 2-7 and 9 are dependent on claim 1, which has been shown to be patentable over the Taylor Application. Because claims 2-7 and 9 include all the features of claim 1, the Applicant submits that these claims are also patentable over the Taylor Application. The Applicants therefore respectfully request that the rejection of claims 2-7 and 9 under 35 U.S.C. 102(e) be withdrawn.

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5. Independent Claims 10, 19 and 28

Claims 10, 19 and 28 each recite a self-authenticating article comprising a plastic paper substitute and authenticating means particularly adapted for revealing encoded, hidden indicia, the authenticating means defining an authenticating area that forms a unitary and integral structure in combination with the plastic paper substitute.

As discussed above, the Taylor Application does not disclose self-authenticating articles that make use of encoded, hidden indicia or that include authenticating means for revealing encoded, hidden indicia. Accordingly, the Applicants respectfully submit that the Taylor Application does not disclose the features of claims 10, 19 and 28 and that the rejection of claims 10, 19 and 28 under 35 U.S.C. 102(e) should therefore be withdrawn.

6. Dependent Claims 11-16, 18, 20-24, 27, 29-34 and 36

Claims 11-16, 18, 20-24, 27, 29-34 and 36 are each dependent on one of claims 10, 19 and 28, which have been shown to be patentable over the Taylor Application. Because claims 11-16, 18, 20-24, 27, 29-34 and 36 include all the features of the claims on which they depend, the Applicant submits that claims 11-16, 18, 20-24, 27, 29-34 and 36 must also be patentable over the Taylor Application. The Applicants therefore respectfully request that the rejection of claims 11-16, 18, 20-24, 27, 29-34 and 36 under 35 U.S.C. 102(e) be withdrawn.

B. Paragraph 8 Rejection of Claims 8, 17, 26 and 35

In paragraph 8 of the Office Action, claims 8, 17, 26 and 35 were rejected under 35 U.S.C. 103(a) as being assertedly unpatentable over the Taylor Application. The Applicants respectfully traverse this rejection.

Claims 8, 17, 26 and 35 depend on claims 1, 10, 19 and 28, respectively. The Applicant submits that claims 1, 10, 19 and 28 are patentable over the Taylor Application for at least the

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reason that the Taylor Application does not teach, disclose or suggest a self-authenticating article comprising means for revealing encoded, hidden indicia. Because claims 8, 17, 26 and 35 depend on claims 1, 10, 19 and 28, the Applicant respectfully submits that claims 8, 17, 26 and 35 must also be patentable over the Taylor Application. The Applicant therefore requests that the rejection of claims 8, 17, 26 and 35 under 35 U.S.C. 103(a) be withdrawn.

### **III. NEW CLAIMS**

The present amendment adds new claims 46-48. Support for claim 46 appears in the specification at page 32, line 12 to page 35, line 15. Support for claims 47 and 48 appears at page 22, lines 7-18 and page 34, lines 15-21. The Applicant believes that no new matter is presented by these claims.

### **IV. CONCLUSIONS**

For at least the reasons set forth above, the Applicant respectfully submits that claims 1-36 are in condition for allowance. The Applicant believes that new claims 46-48 are also in condition for allowance. The Applicant therefore requests that the present application be allowed and passed to issue.

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Should the Examiner believe anything further is desirable in order to place the application in even better condition for allowance, the Examiner is invited to contact the Applicant's undersigned representative.

Respectfully submitted,



David E. Baker  
Attorney for Applicant  
Registration No. 42,285  
Telephone: (804) 788-8762  
Facsimile: (804) 343-4598

Please direct all correspondence to:

J. Michael Martinez de Andino  
HUNTON & WILLIAMS, LLP  
Riverfront Plaza, East Tower  
915 East Byrd Street  
Richmond, VA 23219  
(804) 788-7216 telephone number  
(804) 788-8218 facsimile number